

1                                 Friday, 14<sup>th</sup> April 2000  
2                                 [Open session]  
3                                 [The witness entered court]  
4                                 --- Upon commencing at 9.33 a.m.  
5                                 [The accused entered court]  
6                                 JUDGE RODRIGUES: [Interpretation] Good  
7 morning, ladies and gentlemen; good morning to the  
8 interpreters. I can hear you too. Thank you. The  
9 technical booth, the legal assistants, the Prosecution,  
10 the Defence, the court reporters, General Krstic. Good  
11 morning to you all. I also wish the public good  
12 morning.  
13                                 We already have a witness in the courtroom.  
14 I think it is Witness P. You're now going to read the  
15 solemn declaration that the usher is going to give  
16 you. Please go ahead.  
17                                 THE WITNESS: [Interpretation] I solemnly  
18 declare that I will speak the truth, the whole truth,  
19 and nothing but the truth.  
20                                 THE WITNESS: WITNESS P  
21                                 [Witness answered through interpreter]  
22                                 JUDGE RODRIGUES: [Interpretation] Please be  
23 seated. Are you comfortable, Witness P?  
24                                 THE WITNESS: I'm fine, thank you.  
25                                 JUDGE RODRIGUES: [Interpretation] Have you

1 had a good rest?

2 THE WITNESS: Yes.

3 JUDGE RODRIGUES: [Interpretation] So please  
4 be at ease. I think it is Mr. Harmon who is going to  
5 put questions to you, so for the moment you will be  
6 answering questions put to you by the Prosecutor.

7 Mr. Harmon, you have the floor.

8 Excuse me. Yes, there is a minor matter that  
9 we have to attend to. Witness P, the registrar is  
10 going to show you a piece of paper with your name  
11 written on it. Look at it, please, and tell us, simply  
12 by saying yes or no, whether that is indeed your name.

13 THE WITNESS: Yes.

14 JUDGE RODRIGUES: [Interpretation] So it is  
15 your name indeed.

16 THE WITNESS: Yes.

17 JUDGE RODRIGUES: [Interpretation] Fine. So,  
18 Mr. Harmon, you have the floor now.

19 MR. HARMON: Good morning, Mr. President,  
20 Your Honours; good morning, counsel; good morning,  
21 Witness P.

22 Mr. President, before I begin my examination  
23 of Witness P, I just want to inform Your Honours that  
24 after Witness P we have one additional witness to call  
25 for today, and at the end of the testimony of the

1 second witness we would like to introduce some  
2 documents. The introduction of those documents will  
3 not take more than 15 minutes. So we can schedule the  
4 day accordingly. I bring that to Your Honours'  
5 attention and I will now commence my examination of  
6 Witness P.

7 JUDGE RODRIGUES: [Interpretation] Yes. Allow  
8 me to say to you that all the witnesses are very  
9 special.

10 MR. HARMON: Thank you.

11 Examined by Mr. Harmon:

12 Q. Witness P, could you tell us how old you are?

13 A. I'm 40.

14 Q. And are you a Muslim by faith?

15 A. Yes.

16 Q. Before the creation of the UN safe area of  
17 Srebrenica, were you a member of the Territorial  
18 Defence?

19 A. Yes.

20 Q. Were you wounded?

21 A. I was wounded on the 16th of June, 1992, by  
22 orders of the army command, or rather the Territorial  
23 Defence. I was appointed to working on the collection  
24 of humanitarian aid in the local community.

25 Q. So following your injury you were released

1 from the Territorial Defence?

2 A. Yes.

3 Q. At the time of the fall of the enclave in  
4 July of 1995, were you a member of the Bosnian Muslim  
5 army?

6 A. I was not.

7 Q. Now, I'd like to focus your attention on the  
8 fall of the enclave in July of 1995, specifically on  
9 the 11th of July, 1995. At that point in time were you  
10 married and did you have children?

11 A. Yes. I was married and had four children.

12 Q. And could you tell the Judges what happened  
13 on the 11th of July that caused you and your family to  
14 go in different directions?

15 A. We simply received orders from the civilian  
16 structures that we had -- all of us had to go to the  
17 enclave of Srebrnica. Our assignment was that all of  
18 us should go towards Sushnjari, especially the men,  
19 whereas the men [sic] and women went to UNPROFOR, to  
20 Potocari. We got to a hill called Lehovici, where we  
21 split up. So all the women and children went to the  
22 battalion compound in Potocari and the men towards  
23 Sushnjari.

24 Q. Why was there a distinction between where the  
25 women went and where the men went?

1           A. Simply we didn't dare. We didn't dare go to  
2 Potocari. We couldn't trust them. So only the women  
3 and children dared go to Potocari.

4           Q. When you say "we couldn't trust them," who  
5 are you referring to as "them"?

6           A. The Serbs, because when they captured the  
7 enclave, they controlled the UN. They took their  
8 vehicles. They occupied the enclave. So we didn't  
9 dare go to Potocari.

10          Q. Now, Susnjari, how many men gathered -- men  
11 and boys gathered at that location, approximately?

12          A. The figure ranged between thirteen and  
13 fifteen thousand, according to the municipal  
14 authorities. The figure could not be established, but  
15 I think it was between thirteen and fifteen thousand.

16          Q. Do you know the range of ages of those males  
17 who had gathered at Susnjari?

18          A. From 16 to 50 or 60 maybe. Though there were  
19 some women, or rather girls, who followed their  
20 boyfriends there, men. A smaller number of women,  
21 maybe some 200 or 300.

22          Q. Are you able to estimate the number of men  
23 amongst that group who were armed?

24          A. Well, about one third had weapons in that  
25 group.

1 Q. Witness P, did you have a weapon?

2 A. No, I did not.

3 Q. Now, I understand that the people in that  
4 group of approximately 15.000 people left the enclave  
5 in a column; is that correct?

6 A. Yes. The column was formed. The order was  
7 that we had to pass through Serb lines. So it was  
8 about 7.200 kilometers to free territory, to Tuzla, so  
9 we had to break through the lines. And the column was  
10 formed at the very entrance to the place Buljim, so  
11 this column was some ten kilometers long.

12 Q. And in which direction did the column  
13 advance?

14 A. It advanced towards Konjevic Polje. We  
15 passed Nova Kasaba and then on towards Tuzla.

16 Q. Now, Witness P, I'm not going to ask you  
17 questions about your experiences in the woods --  
18 perhaps the Judges would like to inquire about that,  
19 perhaps counsel will inquire about that -- but I want  
20 to fast-forward the experiences that you had to the  
21 13th of July, when there was a decision taken by you  
22 and by others to surrender to the Bosnian Serb army.  
23 Can you tell the Judges, did you surrender, and can you  
24 tell the Judges why you did?

25 A. Yes. My group - a relative of mine was

1 seriously wounded, my cousin, and there was a small  
2 group left of some 30 men. The night between the 12th  
3 and the 13th we were cut off from the big column. We  
4 were in a stream. It was foggy. We didn't know where  
5 we were.

6 In the morning there was heavy shelling.  
7 Shells were falling around us. There was an  
8 ultimatum. They were calling us out on the loudspeaker  
9 that we had to surrender, that we should carry the  
10 wounded, that we should be exchanged, according to the  
11 Geneva Conventions, that no one would be harmed. There  
12 was a lot of hesitation amongst us whether we should  
13 try to pull out or to surrender to the Serb soldiers at  
14 Kravica. And after a time they said they would begin  
15 the countdown, and the order was to collect the  
16 wounded. A number of people were killing themselves,  
17 committing suicide. They didn't want to surrender.  
18 When we carried down the wounded to Kravica, a column  
19 was formed towards Konjevic Polje.

20 Q. Now, you said a number of people committed  
21 suicide. Did you see people commit suicide, and do you  
22 know why they did commit suicide?

23 A. Yes. Yes, I did see it. I don't know.  
24 There were poisons that were being thrown, poisonous  
25 gases, and people lost control. They knew more or less

1 what lay in store for them, that they would be killed  
2 or put into camps. And I saw two brothers. I don't  
3 know their names. First they embraced each other.  
4 They had an automatic rifle. There was a scream. They  
5 opened a burst of fire to one another. Then there was  
6 another group of people that threw a bomb into the  
7 group, and then four or five of them were wounded.

8 Q. Now, Witness P, I'm going to ask you to talk  
9 just a little bit slower, because the interpreters need  
10 to follow your testimony.

11 A. Yes, I'll do that.

12 JUDGE RIAD: Excuse me now the group of  
13 people who threw the bomb they were from the group of  
14 Muslims or the group of Serbs?

15 MR. HARMON:

16 Q. Did the people that throw the bomb that you  
17 just testified about, were they Muslims committing  
18 suicide or were they Serbs killing Muslims?

19 A. I think it was Muslims who were killing  
20 themselves. I heard that they may have been Serbs  
21 too. At that moment, I couldn't distinguish one from  
22 the other. They were all mixed together.

23 JUDGE RIAD: And the poisonous gases, they  
24 were thrown by the Muslims to commit suicide?

25 A. No, it was the shells with poisonous gases.

1 I could feel it myself, my eyes were stinging and one  
2 was very thirsty and one could feel it on one's own  
3 skin.

4 MR. HARMON:

5 Q. Now, Witness P, how many people along with  
6 you went down to surrender on the 13th of July?

7 A. I said that there may have been some 30 men  
8 in my group; I didn't count them. We had four or five  
9 wounded. And on the asphalt road, we came across a  
10 large group that had surrendered at Konjevic Polje,  
11 there were 300 or so people and they had some 20  
12 wounded.

13 THE INTERPRETER: Could we ask the witness to  
14 move away from the microphone, please.

15 MR. HARMON:

16 Q. I've been asked by the interpreters if you  
17 can move a little bit away from the microphone.

18 Now, Witness P, when you surrendered to the  
19 Bosnian Serb soldiers. Can you describe their  
20 appearance, how they were dressed?

21 A. They were wearing camouflage uniforms in dark  
22 blue, dark blue camouflage uniforms.

23 Q. Did you see any people in dark green  
24 camouflage uniforms?

25 A. Let me see. At that moment, I didn't really

1 distinguish. We were all frightened. I know that they  
2 all had camouflage uniforms. Whether they were lighter  
3 in colour or darker in colour, I really couldn't tell.

4 Q. Now, do you know the difference between  
5 police camouflage uniforms and army camouflage  
6 uniforms?

7 A. At the time, I didn't, but later I saw on  
8 television that there was a difference, but at that  
9 moment, I really can't remember whether there was any  
10 difference.

11 Q. All right. Tell the Judges what happened  
12 after you surrendered; where did you go?

13 A. When we carried down the group of wounded to  
14 Konjevic Polje, this group of mine, between 250 and 300  
15 men.

16 The order was to lay down the wounded at the  
17 cross roads at Konjevic Polje. One of the Serbs told  
18 us that they would take over the care of the wounded.  
19 They put us up in a hangar which used to be a kind of  
20 shopping area and some people started bringing water,  
21 but it wasn't enough. There were only two or three  
22 bucket fulls of water.

23 We stayed there for some 20 minutes and then  
24 the order came to get on to trucks. I ran out and I  
25 saw three or four trucks. I don't remember exactly

1 whether there were three or four. They were parked at  
2 the very crossroads at Konjevic Polje.

3           The trucks were facing Milici and Nova  
4 Kasaba. The trucks were covered with canvas. I  
5 couldn't see, and I don't remember the licence plates  
6 nor whom they belonged to but I think they were  
7 civilian trucks. They had canvas covers, and I think  
8 they belonged to the Boksit company, I think. I'm not  
9 sure. And we had to climb on to the trucks and the  
10 truck I was in started towards Nova Kasaba.

11           Then we passed a sports field that used to be  
12 used before the war, and the order was to get off the  
13 bus, the truck, I'm sorry. When we started getting off  
14 to our right-hand side, I saw a group of Serb soldiers  
15 who were waiting for us there.

16           The order was that all the equipment that we  
17 had on us, except for money and gold, which they had  
18 taken from us at the very beginning in Kravica, that we  
19 had to throw those things on to a big pile. And there  
20 was a big pile of bags and backpacks and there were  
21 some poplar trees there, and we got off the truck in a  
22 line and entered this stadium.

23           The stadium was full of men. According to my  
24 estimate, there were between 2.500 to 3.000 men and  
25 they were all sitting there in a - within the

1 compound. And my group that got off the trucks, we  
2 formed a new row there in the playground, sports field.

3 MR. HARMON: Now, let me have Prosecutor's  
4 Exhibit 12/4 and place this on the ELMO.

5 Q. Witness P, I'm going to ask you if you can  
6 identify this location that's depicted in this image.  
7 Do you recognise that?

8 A. Yes.

9 Q. What is that?

10 A. This is the stadium at Nova Kasaba. This is  
11 the goal [indicates]. And we stopped here somewhere  
12 next to the trees. This is the road to Konjevic Polje  
13 to Nova Kasaba, and this is where I entered the stadium  
14 [indicates], the sports field.

15 MR. HARMON: Indicating for the record that  
16 the entry into the stadium was midway along the line of  
17 trees that borders the road that goes from the top of  
18 the image to the bottom of the image.

19 Q. Now, this stadium, this football field, is  
20 the location where you said there were thousands of men  
21 on it; is that correct?

22 A. Yes, yes, yes.

23 MR. HARMON: I'm finished with that image.  
24 Thank you very much.

25 Q. Can you tell the Judges, was the football

1 pitch - how many men were on the pitch and how much of  
2 the area of the football field was covered by those  
3 men?

4 A. I didn't quite understand your question. You  
5 mean the Bosniaks?

6 Q. Let me ask it again. Did the Bosnian Muslim  
7 men cover the entire football pitch, half of the pitch,  
8 a quarter of the pitch?

9 A. I think that the whole pitch was covered.

10 Q. Now, did you see Bosnian Serb soldiers in and  
11 around the Muslim men who were detained at the football  
12 pitch?

13 A. Bosnian Serb soldiers, about 15 to 20 of them  
14 were waiting for us at the very entrance gates armed  
15 with rifles and they gave us orders. They swore at us  
16 and ordered us to enter the pitch. Within the pitch  
17 itself, around us who were sitting there, there were  
18 Serb soldiers with their guns pointed at us. They were  
19 swearing and giving us orders.

20 Q. Can you estimate the number of soldiers that  
21 you saw around you and the other men at the football  
22 pitch?

23 A. I can't give you an exact estimate because,  
24 after all, it was a long time ago, but there were 15 to  
25 20 at the very entrance. As for the total, in any

1 case, there were many in the field, at least 100 or  
2 so. But that may not be the correct figure.

3 Q. Do you remember how they were dressed?

4 A. Also they had camouflage uniforms on. On one  
5 soldier, I couldn't notice any rank. He may have had  
6 insignia, but they all had camouflage uniforms.

7 Q. Now, continue with your -- describing your  
8 experiences at the football field, please.

9 A. So when my group entered and when we sat  
10 down, after some 15 or 20 minutes behind my back I saw  
11 an APC of olive-green colour arriving, and I saw  
12 several soldiers around the personnel carrier. And  
13 then a big man came out of the APC, some 30 to 40  
14 metres away from me. And when he passed by me, he  
15 turned around and asked whether we recognised him. I  
16 knew him from the media and he introduced himself. He  
17 said that he was the commander of the Serb army, that  
18 he was General Ratko Mladic.

19 He was a heavy man with a short cut,  
20 well-shaved with some receding hairlines in a  
21 short-sleeved shirt. And when he stood in front of us,  
22 I don't remember whether it was a podium or a couple of  
23 steps, I don't know.

24 He started insulting and cursing us. "Where  
25 is your state? What are you dying for? Where is your

1 Alija? Where is Haris Silajdzic? Where are your  
2 leading commanders? Naser Oric and Zulfo Tursunovic.  
3 You are laying down your lives and you've left your  
4 women and children for us to care for them."

5                 And there were other such insulting words and  
6 then the -- at the end he said, "Your authorities in  
7 Tuzla don't want you. So we will put you up. Our  
8 troops will give you water and food, and then we'll see  
9 whether we'll send you to Krajina, to Fikret Abdic or  
10 to the Bijeljina camp to the Batkovic camp in  
11 Bijeljina."

12                 Then orders came for us to get up, to get on  
13 to the trucks. I was towards the end of the field, and  
14 we headed towards the trucks. I also saw the trucks  
15 waiting on the road, three or four trucks, and I think  
16 there was a bus belonging to Boksit Trans from Milici.  
17 They were waiting on the road in front of the exit from  
18 the playing field.

19                 My group of men who -- the group that was  
20 moving with me, when we were going through the gates,  
21 someone said that we should pick up the bags. And Serb  
22 soldiers were guarding the gates and the bags. One of  
23 the group of Serb soldiers said to us, "You won't need  
24 that any longer." Probably they were thinking of what  
25 they were going to do. And so we got on to the trucks

1 again.

2 Q. Let me stop you right there for a moment,

3 Witness P, and ask you two questions.

4 Do you remember approximately what time of  
5 the day it was when you and others started to board the  
6 trucks?

7 A. I think it was about 1700 hours or 5.00 in  
8 the afternoon. Somewhere around 5.00, between 5.00 and  
9 6.00 in the afternoon.

10 Q. Was the statement made by the Bosnian Serb  
11 soldier that you wouldn't need your bags anymore made  
12 at about that same time?

13 A. Yes. As we were leaving the football pitch  
14 and about to climb on to the trucks, I heard one of the  
15 Serb soldiers saying when one of our men wanted to pick  
16 up his bag. I heard him telling him, "You won't need  
17 that bag anymore."

18 Q. My last question about this part of your  
19 experience: Did you receive any food and any water  
20 while you were at the football pitch?

21 A. Never. Far from it. I don't know whether  
22 anyone asked for any water, but none was distributed  
23 anyway.

24 Q. I interrupted you, Witness P, when you were  
25 recounting your story about getting on to the truck.

1 Would you please carry on from that point in time.

2 A. Yes. So we climbed on to the truck. I don't  
3 know how many trucks there were that became full at  
4 that point. My truck started out right away. There  
5 was an order for the trucks to move. So we went in the  
6 direction of Konjevic Polje, that is along the same  
7 road we had used to come there, to get there.

8 When we reached the junction with Konjevic  
9 Polje, the truck turned right again in the direction of  
10 Bratunac. And then we arrived in Kravica. I know  
11 Kravica very well because I had passed through Kravica  
12 on a number of occasions before the war. And we  
13 stopped near a supermarket.

14 My truck -- well in my truck, we happened to  
15 count ourselves, and there were 119 people on my  
16 truck. We were sitting on each other's laps on the  
17 floor, on the bed of the truck with our legs crossed.  
18 I was towards the rear part of the truck which was  
19 covered by canvas. Those were very large canvases, and  
20 at the back of the truck, you could see through because  
21 there was a half a metre opening at that point.

22 So I told you I was sitting in the back of  
23 the truck. And as the truck was turning right, I saw  
24 that there were two trucks behind us. All of them were  
25 facing the direction of Bratunac.

1                It was getting dark at that point, and people  
2    were getting nervous. The Serb soldiers who were  
3    guarding the trucks, who were standing guard around the  
4    trucks started mistreating people, hitting them with  
5    rifle butts through the canvas of the trucks. They  
6    would hit people who sat next to the side of the truck  
7    and they went on torturing them.

8                Then they asked about people from specific  
9    villages from around the area of Srebrenica, the  
10   villages of Glogova, Osmac and other villages. I don't  
11   know why they asked for people from those villages.

12              If anyone stood up, they would take him out.  
13   We spent the whole night on the trucks and we could  
14   hear screams, moaning, cries for help. Screams again.  
15   People shouting, "Please, don't beat me. Don't kill  
16   me. Don't butcher me." It was so terrible, it was  
17   so -- we couldn't take it anymore. I know that five  
18   people were taken off my truck during that night. I  
19   didn't see them being killed there on the spot, but  
20   they didn't come back to the truck. I don't know their  
21   names. And bursts of gunfire could be heard throughout  
22   the night, coming from around the trucks, and the  
23   screams of people, and this lasted all night long.

24              Q.    Witness P, were there two other trucks  
25   parked --

1                   THE REGISTRAR: [Interpretation] Sorry to  
2 interrupt you, Mr. Harmon, but I think there is a  
3 problem with the transcript.

4                   [Technical difficulty]

5                   --- Break taken at 10.08 a.m.

6                   --- On resuming at 10.21 a.m.

7                   JUDGE RODRIGUES: [Interpretation] We shall  
8 resume, Mr. Harmon. You may continue, please.

9                   MR. HARMON:

10                  Q.    Witness P, the technical problem has been  
11 resolved and we'll continue with your testimony.

12                  Now --

13                  A.    Thank you.

14                  Q.    I have placed on the ELMO, to your right, a  
15 map, and I'd like you to take a look at that map. And  
16 if you could use the pointer, first of all, could you  
17 point to the location where you were detained at the  
18 football field.

19                  A.    At the football field, this was here, between  
20 Nova Kasaba and Konjevic Polje [indicates].

21                  Q.    And you were taken in a truck to a different  
22 location, where you spent the night, and you've just  
23 been describing your experiences at that location.  
24 Could you point to that location for the Judges,  
25 please.

1           A.     So we went back towards Konjevic Polje, and  
2     then towards Sandici and Kravica [indicates]. And this  
3     was all along the road towards Bratunac. And this is  
4     where we spent the night, on the trucks.

5           MR. HARMON: Indicating, for the record, the  
6     pointer is on the village of Kravica.

7           Thank you, Witness P.

8           Thank you, Mr. Usher. I'm finished with that  
9     exhibit.

10          Q.     Now Witness P, focusing your attention on the  
11     night of the 13th and the early morning hours of the  
12     14th, while you were in the truck, did you receive any  
13     water? Did you receive any food?

14          A.     While we were in the truck, during the  
15     morning we got only one bucket of water. I don't know  
16     who it was who brought the water, but it was hardly a  
17     drop for all of us. You can image. It was only one  
18     jerrycan of water, and we were 119. We didn't get any  
19     food either.

20          Q.     Now, do I understand your testimony correctly  
21     that in addition to your truck that was at that  
22     location in Kravica, there were two other trucks  
23     nearby?

24          A.     I could see behind my truck two additional  
25     trucks. Whether there were any other trucks, I don't

1 know. I couldn't guarantee. I know that there were  
2 two more trucks, so in total there would have been  
3 three trucks, including mine. I don't know whether  
4 there were any trucks ahead of us. That I couldn't see  
5 because of the canvases.

6 Q. Can you describe the type of uniform being  
7 worn by the Bosnian Serb soldiers who were in and  
8 around your truck on the night of the 13th and the  
9 early morning hours of the 14th?

10 A. I said that they all had a camouflage  
11 uniform. To be perfectly honest, I couldn't tell the  
12 difference. I wasn't familiar with that. And then we  
13 were in great fear. We had been beaten and we didn't  
14 dare look outside. People were cursing at us all the  
15 time. They were mistreating us. And I know that there  
16 was one young man who did not cross over. A Serb  
17 soldier put a gun, the barrel of his gun, in his  
18 mouth. And the situation was terrible. It was so  
19 hot. It was stuffy. People didn't have any water, any  
20 food. And somebody tried and asked for water. It was  
21 total chaos.

22 And at one point we could hear screams. It  
23 was complete madness. We could hear curses, and this  
24 soldier cursed his Balija mother and he put a barrel of  
25 his gun into his mouth. I don't know this man. And he

1 did not reach the free territory. But the soldier told  
2 me, "I will kill you and ten other people if I hear  
3 another word being uttered in the truck."

4           And then everything went silent, and then  
5 perhaps after 20 minutes or half an hour, people  
6 started screaming again, asking for water, for help,  
7 and I could see people drinking their own urine, trying  
8 to moisten their lips with their own urine. So you can  
9 image how it was, and it was all in terrible heat under  
10 the canvas.

11          Q.    Can you estimate how hot it was?

12          A.    The outside temperature must have been around  
13 28 or 30 degrees, so I don't know how hot it would have  
14 been under a canvas. I don't know what the temperature  
15 would be.

16          Q.    How long did you remain at that location in  
17 Kravica before you were transported to a different  
18 location?

19          A.    At Kravica, on the 14th of July, when it  
20 dawned, mistreatment started again, and we spent the  
21 whole day in the truck again. And sometime in the  
22 afternoon -- nobody had a watch. It had all been taken  
23 away from us on the first day when we surrendered.  
24 Nobody had any watch, therefore. But I know that it  
25 must have been in the afternoon, between 2.00 and 3.00

1 in the afternoon.

2 Q. Where did you go?

3 A. At that point I heard somebody say that we  
4 were going to Baskovic, that the trucks were leaving  
5 for the Baskovic camp. And the trucks that had been  
6 facing Bratunac turned around and started back towards  
7 Konjevic Polje.

8 Q. And after the trucks reached Konjevic Polje,  
9 in which direction did they travel?

10 A. So my truck continued right, in the direction  
11 of Zvornik, and I could see, driving right behind us,  
12 maybe some 10 meters away from us, started moving as  
13 well. This truck was escorted by two Serb soldiers  
14 with rifles, who -- one of them was sitting next to the  
15 driver and the other one was also in the cabin of the  
16 truck and he was holding his rifle out through the  
17 window. It was pointing out. And we had been told  
18 earlier on in Kravica that should anyone try to jump  
19 out of the truck, that they would kill ten people. So  
20 I know that my truck was moving in the direction of  
21 Zvornik.

22 We reached Zvornik. I knew the place very  
23 well. But we passed through and continued after  
24 Zvornik, and this is where women and children started  
25 throwing rocks and stones on the buses.

1           We continued then towards Karakaj, towards  
2 the aluminum factory in Karakaj. That area was no  
3 longer familiar to me, but we didn't travel for very  
4 long, and at one point the truck turned left. It was  
5 already evening. We didn't travel for very long, maybe  
6 only for about 15 minutes after Karakaj, after the  
7 factory.

8           The truck therefore turned right, and we  
9 could see the trucks stopping, coming to a halt. I  
10 could see that there was a schoolyard in the area, like  
11 a small playground.

12          Q.    Witness P, let me stop you there for a  
13 minute?

14          MR. HARMON: And if we could have 1/E/1 again  
15 placed on the ELMO, the small map.

16          Q.    And I'd just like you to indicate on this  
17 small map the direction of travel that you took from  
18 Kravica up to the area past Zvornik. And I think the  
19 map will have to be opened up. And just use the  
20 pointer, please.

21          A.    Kravica [indicates], Konjevic Polje  
22 [indicates], then we go down the river to the right of  
23 Konjevic Polje, we come to Zvornik, Karakaj, and  
24 somewhere there, to the left from Karakaj, we came to  
25 the school. Between the Dam and Karakaj, that is where

1 the school was.

2 Q. Thank you very much.

3 MR. HARMON: And for the record, I think it's  
4 fairly clear from his description the route he took  
5 between Konjevic Polje and the Drina River. He crossed  
6 the Drinjaca River. The rest I think is very clear.  
7 He progressed up along the Drina River, past Zvornik,  
8 to Karakaj, and left to an area near Petkovci.

9 Q. Thank you very much, Witness P.

10 MR. HARMON: And I'm finished with the  
11 exhibit, Mr. Usher.

12 Q. Now, how long did it take you to travel from  
13 Kravica to the school that you've just described?

14 A. Well, let me see. When we travelled by  
15 public transport, it took about an hour, an hour and a  
16 half to reach Zvornik. So this was a little bit  
17 further, so about an hour and a half.

18 Q. Will you tell the Judges what happened to you  
19 and to the other men once you arrived at the playground  
20 at the school?

21 A. When we arrived at the playground of the  
22 school, I heard sporadic shooting. Then there was  
23 noise, cursing, yelling. And suddenly my truck  
24 stopped, and when it stopped I saw two other trucks in  
25 addition to mine, facing forward at the school

1 playground.

2                   The order was that we jump off the trucks,  
3 one by one, and as we jumped off, the order was to put  
4 our hands up behind our heads and to chant aloud, "Long  
5 live the Serb Republic" and "Srebrenica is Serb," and  
6 maybe a few other words that I haven't remembered. And  
7 as we were jumping out of the trucks and running, Serb  
8 soldiers, in my estimate, some 20 or so, between the  
9 truck and the school, formed two lines. And as we ran  
10 between them, I said that we had to run and chant those  
11 words. And usually everyone got hit, some with a rifle  
12 but on the back. Some were kicked, some were  
13 slapped. And then we ran towards the school.

14                  Towards the school there were some steps,  
15 five or six steps going down, so that the first level  
16 was lower than the yard itself. There was a double  
17 door, and we ran into the school, into a corridor.  
18 There was a short hall. And again there were soldiers  
19 there who were hitting us and beating us, and they  
20 directed us to the right, up some steps leading  
21 upstairs. There were several steps and then there's a  
22 kind of landing and then the steps turned left to the  
23 second floor. When I reached the second floor, as I  
24 was running I could see that there was an iron railing  
25 in the corridor, and the classrooms were lined one next

1 to another.

2 I know that I entered classroom number 3. 1,  
3 2, 3. Whether there was another classroom further on,  
4 I'm not sure, but I think there was some other rooms  
5 further down. When we entered the classroom, I saw  
6 that it was a school, and on the left-hand side of this  
7 classroom there was a blackboard, and on the floor were  
8 some vinyl tiles, those that are glued on. There were  
9 no school desks. All the windows were closed. And it  
10 was stuffy, because we had travelled under the canvas  
11 in the trucks. And as soon as I entered I saw two men  
12 who had been badly beaten up and covered in blood. At  
13 first glance I thought they were dead. I knew one of  
14 them in person. He's Munib Admovic, who was very badly  
15 beaten. I could describe him. He had a cap and a  
16 jacket. I thought he was dead.

17 So we all sat down in rows. We had to form  
18 those rows from the windows forward. The windows could  
19 not be opened. There were two soldiers standing at the  
20 doorway all the time, and they told us that we mustn't  
21 open the windows, that we must sit there, that we would  
22 be given food and water. And so it went on until the  
23 classroom was full.

24 As soon as it was filled up, other soldiers  
25 started barging in, demanding money. They gave us 15

1 or 20 minutes, otherwise 20 would be killed, if we  
2 didn't collect a certain sum of money. I don't know  
3 how much they said. They would close the door and go  
4 out, and say, "Not a word." The men were tired as a  
5 result of high temperatures. They didn't have any  
6 water, and they started yelling again, and again they  
7 would come through the door, take people out, and one  
8 could hear bursts of fire and shooting around the  
9 school. No one dared look through the window to see  
10 what was happening outside.

11 Suddenly a young man tried to look out, and  
12 someone shot him, and he was wounded in that  
13 classroom. They said, "If anyone had money left in  
14 Srebrenica, that they had hidden, let him tell us and  
15 we would take a car and go to Srebrenica, and that man  
16 would be saved and transported to Tuzla." However,  
17 nobody said they had any money, because this was the  
18 third time they were searching us thoroughly and taking  
19 everything away.

20 Suddenly, a relative, a neighbour of mine,  
21 asked for water. However, he was turned back. A  
22 second time when he went to look for water, he walked  
23 out the door and he never came back. We could hear  
24 fire all the time. Darkness was beginning to fall. I  
25 personally didn't feel well. I was having problems. I

1 was feeling dizzy. I somehow got close to the window  
2 to get some air, and in my estimate, there were about  
3 200 men in that classroom.

4 And what happened, I don't really know  
5 myself. Suddenly when I came to a little, I could see  
6 that there were only a few men left in the classroom,  
7 15 to 20, and I could see on those tiles blood and  
8 water, or rather urine, and then I saw Munib Admovic,  
9 who was trying to get up, and I asked him, "What has  
10 happened?" And he couldn't give me an answer.

11 Shortly after that two came in from the  
12 outside, two soldiers, and gave orders, "The next four  
13 now." And I saw that I had to get up. I and Kadrija  
14 Becirevic, who was with me, and two other men, I don't  
15 know. We went out together. When we reached the  
16 corridor in front of that classroom, next to the iron  
17 railing, there were four to five Serb soldiers in  
18 uniforms as well, and they ordered us to take off  
19 everything, to strip. And I saw a whole pile of  
20 clothing and footwear and documents, ID cards, medical  
21 ID cards, driving licences and that sort of thing. I  
22 took off my shoes, my socks. I only had my vest on,  
23 and they let me keep that on. We had to turn out the  
24 pockets of our trousers, every little piece of paper,  
25 so make sure there was nothing left. What was the

1 reason for this, I don't know.

2 And so we had to stand against this iron  
3 railing and the order was to put our hands behind our  
4 backs which is what I did. And I saw next to those  
5 soldiers a ball of string or rather rope. And I saw  
6 him cutting pieces of that rope and tying my hands  
7 twice around. There may be pictures somewhere how they  
8 tied me up. And he was a big man. He was fair. I  
9 don't know him. He just asked me where I was from.  
10 When I told him where I came from, he slapped me, he  
11 cursed my balija mother, and he pushed me opposite  
12 classroom number two.

13 Classroom number two was open, the door was  
14 open then, and there was no light on. When I felt, I  
15 fell on a friend of mine. He hasn't come either. They  
16 were all tied up in that classroom. I couldn't say  
17 much, I just asked him, "What is happening?" He  
18 couldn't give me an answer. I knew then that the end  
19 was approaching.

20 Some 15 or 20 minutes later until all these  
21 men had come out and were tied up, I heard the order,  
22 somebody yelling, "Send me ten." And the man at the  
23 door said, "Get out, ten of you."

24 And I was near the door, and as a group we  
25 ran out with our hands tied down the steps. And when I

1 started down the steps, I saw in that corridor or I  
2 could feel under my bare feet that there was blood.  
3 And in the hallway at the bottom of the steps, three to  
4 four men lying dead in the hallway of the school.

5 In front of the school there was a truck. It  
6 was already night-time, I don't know what time it was,  
7 but I think it was after midnight. And the truck was  
8 standing there, the back part facing the entrance to  
9 the school. The back side was down.

10 And so with our hands tied, barefooted, naked  
11 to the waist had to climb into the truck which was  
12 covered with a canvas. What type of truck it was, I  
13 don't know, whether it was a military or a civilian  
14 vehicle because it was dark.

15 The truck was filled quickly, they would say,  
16 "Ten of you," then, "Twenty of you." Then this one  
17 down there would call to the one upstairs. And when we  
18 climbed into the truck, it was packed full. The order  
19 was that we should sit down. We couldn't sit down when  
20 it was packed.

21 Again, they cursed us, our ba'ija mothers.  
22 They said, "Haris Siladzic and Alija would receive you  
23 dead and wounded." They were probably implying some  
24 sort of exchange.

25 And again, a burst of fire at our feet and

1 then this relative, Kadrija Becirovic, said to me,  
2 "I've been hit." And I only know that he dropped down  
3 amongst us. I know nothing more about him. And then  
4 the truck started. It was dark.

5 Q. Let me interrupt you before we go on to the  
6 next part of your testimony.

7 MR. HARMON: If I could show the witness five  
8 exhibits; 21/1, 21/3, 21/4, 21/5 and 21/7.

9 Q. I'm going to show you a series of pictures  
10 that you've seen before in my office. Let me ask you  
11 this, Witness P, did you return to the location of that  
12 school with investigators from the Office of the  
13 Prosecutor?

14 A. Yes.

15 Q. And you identified that school as being the  
16 location where you were detained; is that correct?

17 A. Yes.

18 Q. I'm going to show you some pictures, a series  
19 of pictures starting with 21/1. I'm going to ask you  
20 if you can identify the buildings that are in that  
21 particular exhibit. Can you identify the buildings in  
22 that exhibit?

23 First of all, do you see a large parking lot  
24 on the left side of the image? Now, your pointer is on  
25 a building. Can you identify that particular

1 building? If not we'll go to the next exhibit.

2 MR. HARMON: Let's go to Prosecutor's Exhibit  
3 21/3, please.

4 A. I really can't find my way, somehow.

5 Q. All right. We'll go to the next exhibit.

6 MR. HARMON: Can we go to 21/3, please.

7 Q. Now, does this clarify the location for you?

8 A. This is the playground. Yes. The school,  
9 the entrance to the school. And this is the route we  
10 look.

11 MR. HARMON: Indicating, for the record,  
12 there is a flat area where the witness now has his  
13 pointer which is the playground.

14 A. That is where the trucks were [indicates].

15 MR. HARMON: The building in front of a  
16 playground is the school where he was detained.

17 A. This is the entrance [indicates].

18 MR. HARMON: Can we now turn to Prosecutor's  
19 Exhibit 21/4.

20 Q. Do you recognise this picture?

21 A. Yes.

22 Q. What is it?

23 A. The steps that I mentioned going down the  
24 five or six that lead to the entrance to the school.

25 Q. All right.

1           A.     The double door that I mentioned a moment  
2     ago.

3           MR. HARMON: The witness pointed to the  
4     double doors to the right side of the building. Thank  
5     you. Could we turn to 21/5, please.

6           Q.     Do you recognise this picture, Witness P?

7           A.     Yes. The steps, as I said, the landing and  
8     then the -- go upstairs and the iron rails. This is  
9     where we were; one, two, three.

10          Q.     Let me turn to the last picture in  
11     Prosecutor's Exhibit 21/7 and ask you if you can  
12     identify this location?

13          A.     Yes. As I said, the vinyl tiles that I  
14     mentioned that are glued on, and to the left, a  
15     blackboard. This is the classroom, the entrance  
16     [indicates], and in the door, the chimney stack for a  
17     stove with a hole in it.

18          Q.     This is the location where you were detained  
19     prior to being taken out and put back on the truck?

20          A.     Yes, yes. I was here somewhere near the  
21     blackboard [indicates]. Later, I moved closer to the  
22     window. You can't see the window in this picture. So  
23     I was here somewhere [indicates].

24          MR. HARMON: When the witness indicates  
25     "here", he's referring to a place directly under the

1 blackboard. Thank you very much, Mr. Usher.

2 Q. Now, we'll continue with your testimony,

3 Witness P. You said you and other men had boarded a  
4 truck. Can you recall approximately how many men were  
5 in your truck? You said it was packed?

6 A. After all, it was night-time, nor could  
7 anyone count, so I don't know the figure. But imagine,  
8 100 or so men at least. It was a big truck I think.

9 Q. Would you continue, please, with your  
10 testimony, describing the events once the truck started  
11 on its next leg of the journey.

12 A. We had climbed onto the truck after the  
13 shooting, and the truck's engine started. As soon as  
14 it started moving from the school, I saw immediately  
15 that it was a bumpy road, and we were swaying left and  
16 right and hitting each other because our hands were  
17 tied. We were standing up.

18 The truck didn't travel for long, maybe 10 or  
19 15 minutes. I don't know what time it was. I know it  
20 was after midnight. And then suddenly the truck  
21 stopped somewhere. At first glance, I could just see  
22 that there was a little light, that there was some sort  
23 of light reaching us.

24 And so as soon as we stopped there, we heard  
25 heavy bursts of fire, noise, yells. I just heard

1 someone say, "Come down ten. Come on five." And we  
2 had to run off the truck. How I got off, I don't know  
3 myself. Whether there was any assistance, some way to  
4 get off, but we were jumping off and we were all  
5 terrified.

6 And when we got there and it was lighted, I  
7 saw a very big field of men lying dead who had  
8 previously been killed. They were all facing -- their  
9 faces were on the ground and they were all tied up. So  
10 I and this group of mine were told to form a new row,  
11 somebody was giving us the command, the orders.

12 And so we went to the area where we were shot  
13 at with our hands tied and barefooted. I saw that the  
14 path was rocky. I was barefooted, I didn't really know  
15 where we were. I didn't know the location.

16 So we formed a new row. We went to the end.  
17 And as we were passing at great speed, of course, I saw  
18 a group to my right of Serb soldiers in uniform, they  
19 were. And on their heads, they had something black,  
20 whether it was socks or something so you couldn't see  
21 their faces. They were pointing their guns at us and I  
22 just heard one say, "Fall to the ground." That was the  
23 order.

24 After that, I really don't know what  
25 happened. Behind my backs, I just heard strong bursts

1 of fire. They were shooting at our backs, at our  
2 heads. From a distance of seven to ten metres, there  
3 was this group of soldiers shooting.

4 I fell over bodies of those who had been  
5 executed before me. As I tell, I had some kind of a  
6 premonition that I might be saved. I tried to tuck my  
7 head between the legs of those who had been killed  
8 before me. I don't know, myself, how I managed to do  
9 that. I could hear fragments and shrapnel and stones  
10 hitting me at my arms and legs, but I realised I hadn't  
11 been wounded yet.

12 But then suddenly, something hot seemed to  
13 have been poured on my face. And as my hands were tied  
14 behind my back, I couldn't do anything. I kept digging  
15 my head down among the dead. How long this lasted, I  
16 can't remember. The shooting, the bursts of fire, I  
17 was probably unconscious again.

18 And suddenly, I heard some voices, individual  
19 shots being fired and they were calling each other by  
20 name. One said, "Simo and Dragan, come here." And  
21 open brief bursts of fire into their heads. There must  
22 have been some men alive and indeed there were. And so  
23 they opened fire at them.

24 He came close to me. I heard them searching  
25 the rows. And then, again, they cursed balija mothers

1 and one said, "You should see what he looks like. He's  
2 like a skeleton." He was probably implying the chest  
3 of this man. And he said, "If I had seen him in broad  
4 daylight, I would have been afraid of him."

5                 And I heard those Serb soldiers exchanging  
6 these words amongst themselves. I was lying down among  
7 the dead with my hands tied behind my back. I heard  
8 the steps. He kicked me here with his boot, with his  
9 leg and he said, "He's dead."

10                 After that, what happened with me, these were  
11 moments after which I suddenly came to. I really  
12 didn't know what had happened. I felt I was  
13 suffocating. I was lying with my face down, with my  
14 hands behind my back. And as those men were falling,  
15 someone had fallen on my neck. And I didn't have any  
16 air to breathe. I tried to pull myself out, pull my  
17 head out from among the bodies. I could hear moans and  
18 movements, so someone was still alive. And somehow --  
19 as I said, my hands were tied. I couldn't pull free  
20 with my fingers.

21                 I heard a voice, a man saying the following  
22 words, he was whispering, "My friends, let's move  
23 down. They'll kill us. I am alive too." I plucked up  
24 some courage, and I said to him, "If you can, come on,  
25 let's try and escape."

1                   And then he somehow managed to get some five  
2 or six metres behind me in another row. He tried to  
3 reach me. He said, "You have double ropes around your  
4 hands and I can't untie you." I was whispering to him,  
5 "Can I untie you?"

6                   So he crawled up to me and I managed to pull  
7 his hands free. And he said, "Let's run." You could  
8 hear a machine approaching. We could see the lights of  
9 the machine and the sound of this vehicle moving and he  
10 said, "They'll kill us all here."

11                  And I was still tied up, he helped me get up  
12 and barefooted, covered in blood, stripped to the  
13 waist. I still didn't know where he had been wounded.  
14 We are treading over those dead bodies.

15                  And down there we saw a kind of thicket, some  
16 woods, and we thought we could reach it though the  
17 grass was high and they would be able to see us  
18 moving. But we had no choice. And only did we manage  
19 to reach the wood when we caught sight of a big  
20 concrete ditch that was leading somewhere. We didn't  
21 know the area.

22                  At the bottom of the ditch we saw a bit of  
23 water. This was water with a muddy sediment. We tried  
24 to reach that water to freshen up and for him to try  
25 and untie me.

1               And as we were going towards this ditch to  
2 our right, or rather to our left, a vehicle was  
3 approaching. We didn't know what kind of vehicle. I  
4 just concluded that it was a tractor with a trailer.  
5 We heard it bumping over the macadam and as we reached  
6 the ditch, I said to this person, Take two stones. And  
7 he found two rocks to try and cut the rope.

8               So I leaned my hands against the rock and  
9 with those two rocks, he cut through the ropes. When  
10 he did that, my hands were freed. I saw that I had  
11 been scratched on the head. I was bloody. This other  
12 person was wounded more seriously than me. I had this  
13 vest on me. I took it off and bandaged his wound.

14              We found a bit of water so we washed up a  
15 little. And we decided we would stay there until dawn  
16 came. This must have been just before dawn, the  
17 moments before night and day.

18              And behind us, on the field where we had been  
19 shot at, we could hear strong fire again, noise and the  
20 noise made by the machine. We heard the thuds as they  
21 were unloading. We couldn't see from the ditch what  
22 was actually happening.

23              As soon as daylight came, we decided to leave  
24 the area, though we didn't know where we were. We  
25 passed through a small wood. We found some mushrooms,

1 some leaves, something to eat.

2 And we saw a guard house, a small hut above  
3 us. And in that hut, a machine was parked. It was a  
4 bulldozer, a large bulldozer, that pushes the material  
5 in front of it with a shovel and there was a man with a  
6 rifle near that hut. Whether he had a uniform, I don't  
7 know, but he was probably a guard working for that  
8 company left over from before.

9 So we didn't dare go ahead in that direction,  
10 so we retraced our steps, went back to the same ditch  
11 where we had been in the morning. We continued to hear  
12 explosions, the work of the machine, but we didn't know  
13 what was happening, so we were back in the ditch, and  
14 to the left of that ditch we saw a Bosniak village that  
15 had been burned down. We saw the walls still  
16 remaining, the chimneys that had been toppled and we  
17 decided we would go to that village to try and find  
18 some fruit and water to freshen up. We were barefooted  
19 and wounded.

20 So after we had crossed the ditch, we came up  
21 on a macadam road which was passing along the Dam. So  
22 we crossed that macadam road. I was the first one to  
23 cross it, and then T motioned to him to cross it as  
24 well, because there were no vehicles. And this is  
25 where we refreshed ourselves a little bit. We found

1 some water and we found some fruit.

2 We must have been some 150 or 200 meters from  
3 the area where they were loading machines. So we stood  
4 there watching. We didn't dare move. We were simply  
5 lying in some brambles. We didn't know what to do.

6 The loader arrived that morning, the one with  
7 a bucket, and it was loading dead bodies onto a  
8 tractor. I know that it was a tractor. It was a large  
9 type of tractor with very big wheels on the back and  
10 smaller wheels on the front, and it had a trailer as  
11 well. So we could see it scoop up between 10 and 15  
12 bodies with its bucket, and then it threw the bodies  
13 onto the tractor.

14 The tractor that was transporting the bodies  
15 would leave in a direction, but we couldn't follow it  
16 for very long, because at one point it turned off. All  
17 we could observe was that it was coming back very  
18 soon. The journey would probably last about 20  
19 minutes, and after 20 minutes it would come back. So  
20 meanwhile the loader with the bucket, with the shovel,  
21 would be waiting for the truck to come back.

22 We could hear shots during that time. We  
23 didn't know whether they were still killing people,  
24 finishing them off, but shots could be heard, at any  
25 rate. And we could hear them yell at each other, shout

1 at each other. And this is where we stayed throughout  
2 the day. It was the 15th of July.

3 It was getting dark and we knew that we could  
4 no longer stay there, so we -- from where we were  
5 standing, we could see some water. We didn't know  
6 where we were. But once we were in this village, we  
7 could see a very large lake. At first I thought it was  
8 the Drina River, but later on I found out that it was  
9 an artificial lake that belonged to the aluminum  
10 factory, would discharge waters.

11 So there was a ditch leading to the Dam where  
12 we had been. I'm not sure that they threw bodies into  
13 the lake, but I think that they threw them somewhere in  
14 the vicinity of the Dam. We couldn't see the tractor.  
15 It would turn off behind the Dam and disappear from  
16 sight. But it would come back very soon.

17 So we spent the whole day there, waiting, and  
18 at one point we saw the TV relay at Majevica, which was  
19 in the direction of Tuzla. So I told this young man  
20 that we should leave, that we should go in that  
21 direction, and we actually started out in the direction  
22 of the industrial area of Karakaj. The area was  
23 inhabited, so we didn't dare come out. We didn't dare  
24 cross the area. We were just trying to follow the  
25 relay, the TV transmitter.

1           Q.    Let me interrupt you there for just a moment  
2 and let me ask you just a couple of questions to  
3 clarify your testimony. When you looked back from your  
4 position away from the killing field, can you estimate  
5 how many bodies were laying on that field?

6           A.    Well, I didn't make any estimates at the  
7 time, but judging by the features of the terrain and  
8 the number of people in the school, it must have been  
9 between 1.500 and 2.000 people.

10          Q.    Now, you also said that you observed some  
11 heavy construction-type equipment. One was a bulldozer  
12 with a scoop.

13          A.    Yes.

14          Q.    Are you familiar with construction equipment?

15          A.    Yes, very much so. I knew these types of  
16 construction machines. I had worked with them. There  
17 was a bulldozer with "Caterpillar" which had a kind of  
18 blade at the front. It was not moving, that machine,  
19 the bulldozer, whereas a loader that was standing next  
20 to the bodies was. And there was a third machine, a  
21 tractor which had a trailer and which transported the  
22 bodies.

23          Q.    Can you identify more specifically the  
24 bulldozer with the scoop, the type of vehicle that was?

25          A.    Well, there are several types: number 8, 9,

1 7. I believe it was the type number 7, with  
2 Caterpillar, with tracks. As regards the loader, this  
3 type of machine, I believe it was the ULT machine. I  
4 used to work with the same type of machines. And they  
5 were produced - They were manufactured in Kragujevac  
6 before the war. Now they're importing them. They are  
7 of various types: 160 and 200. I believe that that one  
8 was ULT 160. It was orange in colour and it had a  
9 scoop in front of it.

10 Q. Now, you also were taken to the location of  
11 the killing field with investigators from the Office of  
12 the Prosecutor and confirmed that being the location  
13 where you and others had been taken for the execution;  
14 is that correct?

15 A. Yes.

16 Q. Let me show you four exhibits and ask you if  
17 you can confirm that the images depict the location --

18 A. I'm sorry. There's one thing that I forgot  
19 to mention. When we got out, when we reached the  
20 village, from my vantage point I could see the Dam and  
21 I could see two very high pillars with floodlights  
22 which were on during the night. They were throwing  
23 light onto the area, onto the plateau where we had been  
24 shot at.

25 Q. Thank you for that addition. I'm going to

1 show you four exhibits, and what I'd like you to do is  
2 merely confirm whether this is the location where the  
3 executions took place.

4 MR. HARMON: If I could start first of all,  
5 Mr. Usher, with a panorama, which is Prosecutor's  
6 Exhibit 22/3, and if that could be shown to the witness  
7 first and then placed on the ELMO.

8 A. This is easier for me, this one. This is the  
9 road.

10 Q. You need to place that on the ELMO so -- now,  
11 using the pointer, could you just -- first of all, is  
12 this the location where the killings took place,  
13 Witness P?

14 A. Yes. Yes, it is. So this is the road  
15 [indicates] and this is where the ditch was, the Dam  
16 [indicates]. This is a kind of protection wall  
17 [indicates]. And this is the location.

18 Q. Would you point to the actual location where  
19 the killings took place in this particular exhibit,  
20 which is 22/3.

21 A. [Indicates]

22 MR. HARMON: Indicating, for the record, an  
23 area that is below the number 100 and to the right of  
24 the area 50, and further to the right, beyond the  
25 actual rectangle.

1           A.    I know this pile of rocks in the shape of a  
2 pyramid. This is where I was that night. And later  
3 on, when we came with the investigators, I saw it  
4 again. This is the pile of rocks [indicates]. And  
5 this is the area where we were [indicates]. And it was  
6 from there that we went down into the ditch.

7           MR. HARMON: There is a pile of rocks  
8 indicated -- or shown on the diagram --

9           A.    Yes.

10          MR. HARMON: -- to the right of the large red  
11 rectangle --

12          Q.    Mr. Witness --

13          A.    And this is the wall [indicates].

14          Q.    I need to describe where you're pointing, so  
15 if you would just remain silent while I have an  
16 opportunity to describe the area. Then if you have  
17 additional comments, I'll permit you to make them.

18          MR. HARMON: The witness pointed to a pile of  
19 rocks which is located to the right of the red  
20 rectangle, and it's evident in the upper part of the  
21 flat surface area.

22          Q.    Do you have anything else to inform the  
23 Judges about this particular exhibit, Witness P?

24          A.    I recognise this wall. I remember it very  
25 well. It is a kind of support wall made of rocks. It

1 is designed to support the Dam, the embankment.

2 MR. HARMON: Indicating the pile of rocks  
3 that's in the lower right-hand corner of that  
4 Prosecutor's Exhibit.

5 Now we'll turn to the next Exhibit,  
6 Mr. Usher, which is 22/4.

7 Q. And I'm going to ask you, very quickly, is  
8 this the cement culvert that you described in your  
9 testimony?

10 A. Yes. This is the concrete ditch. This is  
11 where we climbed down and this is where we took  
12 shelter, hid ourselves.

13 Q. What is the building in the upper right-hand  
14 corner of Prosecutor's Exhibit 22/4?

15 A. This is the guardhouse which we saw, and  
16 another structure next to it. The bulldozer was here,  
17 and these are the pillars where the floodlights were.

18 MR. HARMON: Indicating the bulldozer was  
19 between the house and the floodlights, which are  
20 indicated with a circle on the upper right-hand corner  
21 of the exhibit.

22 Q. Now we will turn to the next exhibit very  
23 quickly, 22/6. Is this also a picture of the cement  
24 culvert through which you and your companion found  
25 shelter?

1 A. Yes.

2 Q. All right. Now if we could turn to  
3 Prosecutor's Exhibit 22/7. Do you recognise what's  
4 depicted in Prosecutor's Exhibit 22/7?

5 A. Yes, I do. This is the road, the path  
6 leading to the Dam, and this is where we had been shot  
7 at [indicates].

8 MR. HARMON: Indicating the red oval on the  
9 right-hand side of the image.

10 Q. Now, you said at some point in time, Witness  
11 P, that you left the killing field and you took shelter  
12 in an area near some buildings that were nearby.

13 A. Yes. This would have been here, in this area  
14 [indicates]. There was a village there.

15 MR. HARMON: Indicating to the left-hand side  
16 of the road, the perpendicular road that comes from the  
17 top of the image down toward the Dam, to the left of  
18 that.

19 Q. Now, let me --

20 MR. HARMON: I'm finished with those exhibits  
21 now, Mr. Usher.

22 Q. And Witness P, thank you very much for  
23 identifying them.

24 Lastly, my last question --

25 A. Thank you too.

1 Q. -- did you and did your companion ultimately  
2 arrive on the Bosnian-held territory,  
3 Bosnian-Muslim-held territory, on the 18th of July?

4 A. Yes, in the afternoon of the 18th of July.

5 Q. Witness P, I've concluded my examination.

6 Thank you very much.

7 A. Thank you.

8 MR. HARMON: Mr. President, I've concluded.

9 JUDGE RODRIGUES: [Interpretation] Thank you  
10 very much, Mr. Harmon. I think that it would be a good  
11 idea to have a short break, perhaps a 10-minute break,  
12 and later there would be a longer break, around half  
13 past 12.00. At this point we will have a only a  
14 10 minute break. I should like to ask the Defence to  
15 try and ask very direct and precise questions for the  
16 cross-examination. A 10-minute break.

17 --- Break taken at 11.23 a.m.

18 --- On resuming at 11.34 a.m.

19 JUDGE RODRIGUES: [Interpretation] Witness P,  
20 you're now going to answer questions that will be put  
21 to you by Mr. Petrusic who is representing the Defence  
22 here.

23 Mr. Petrusic, you have the floor.

24 MR. PETRUSIC: [Interpretation] Good morning  
25 Your Honours, good morning counsel.

1 Cross-examined by Mr. Petrusic:

2 Q. Good morning Witness P.

3 MR. PETRUSIC: [Interpretation] In accordance  
4 with your suggestion, Mr. President, I will try and ask  
5 my questions in a specific manner.

6 Q. Witness P, on the 11th of July, when you went  
7 to Susnjar, did you know that the members of the VRS  
8 had confiscated personnel carriers from the United  
9 Nations?

19 A. Yes, I did. I did know.

11 Q. I believe the witness has answered. We do  
12 not need any further clarification in respect of this.

13 So when you started out from Susnjari towards  
14 Konjevic Polje towards the territory of Tuzla, you said  
15 that at one point the Serb soldiers mixed with you.

16 A. Yes.

17 Q. The Serb soldiers threw hand grenades which,  
18 as far as I understand, contained some poisonous  
19 gases.

20 A. Yes.

21 Q. Could you tell us, briefly, what kind of  
22 consequences did those poisonous gases have?

23 A. Well, we became very thirsty and my eyes were  
24 smarting and there were tears in our eyes.

25 Q. The fact that the Serb soldiers mixed with

1 you and that those grenades were thrown, can we  
2 therefore conclude that the Serb soldiers were at the  
3 same territory the same night?

4 A. No, when they threw grenades it was on the  
5 first night it was only on the following day that the  
6 Serb soldiers mixed with the Bosnian soldiers and  
7 civilians who remained in the forest.

8 Q. It was on the 12th of July then?

9 A. No, it was on the 13th. The ambush was on  
10 the 12th of July in the evening and --

11 Q. I apologise. Were there any opposing views  
12 amongst the representatives of the Muslim population as  
13 regards the situation in which you had found  
14 yourselves, whether you should surrender or continue  
15 with the break-through?

16 A. Could you please repeat your question? I  
17 don't quite understand what you mean by "opposing  
18 views".

19 Q. Well, were there any different views as to  
20 what should be done?

21 A. You mean amongst the Bosnian population?

22 Q. Yes.

23 A. Well, yes, people were trying to reach the  
24 right decision. Some people wanted to surrender, some  
25 were in favour of continuing.

1 Q. In view of that, were there any conflicts?

2 A. Well, most probably there were conflicts  
3 somewhere.

4 Q. At Kasaba at the football field, General  
5 Mladic spoke to you?

6 A. Yes.

7 Q. Did General Mladic mention at that point that  
8 the units with dogs were at that location?

9 A. Yes, he did. He said that there were some  
10 special units there with dogs and dog handlers, and  
11 that every inch of the forest would be covered by them  
12 and nobody would be able to cross the asphalt road.

13 Q. After that, you left for Kravica by trucks?

14 A. Yes.

15 Q. The Serb soldiers called out people from  
16 Glogova, Kravica?

17 A. Not from Kravica.

18 Q. No, from Kamenica, I'm sorry, Osmac?

19 A. Yes.

20 Q. And Zedansko?

21 A. Yes.

22 Q. And those people would actually come out?

23 A. Well, yes, if they were from those villages.

24 But people didn't dare speak up. But those who did  
25 were taken out.

1 Q. Do you know what was the reason for that, why  
2 did they call people from those specific villages?

3 A. I don't know. Maybe they were their  
4 neighbours, they were perhaps looking for their  
5 neighbours, people from their area. I don't know.

6 Q. Did they mention Kravica, did they look for  
7 people from Kravica?

8 A. No, not from Kravica. It wouldn't have been  
9 possible. I don't understand what you mean.

10 Q. While they were calling people out, while  
11 they were looking for specific people, people from  
12 specific villages, did they also mention Kravica? And  
13 my question to you is: Did they ask who had  
14 participated in the take-over in Kravica?

15 A. I didn't hear that.

16 MR. PETRUSIC: [Interpretation]

17 Mr. President, I should like to show the witness, very  
18 briefly again, the statement that he gave to the  
19 investigators of the Tribunal on the 14th, the 15th,  
20 the 16th of August of 1995.

21 THE REGISTRAR [Interpretation] Exhibit  
22 D-18.

23 MR. PETRUSIC: [Interpretation]

24 Q. On page five of the statement given on the  
25 14th of August, 1995, second passage, the second

1 passage from the bottom, there is a portion of  
2 highlighted text. The last sentence of the passage  
3 reads as follows, "The Serbs asked who had participated  
4 in the take over of Kravica when it fell under BH  
5 control."

6 A. I don't remember. I don't know how this was  
7 translated.

8 Q. You signed this statement. Did you sign this  
9 statement?

10 MR. HARMON: Mr. President, may I interrupt?  
11 D-18 is a redacted statement so the signature of this  
12 witness has been removed. We're prepared to stipulate  
13 that the witness did, in fact, sign this statement.

14 JUDGE RODRIGUES: [Interpretation] Thank you  
15 very much for your remark, Mr. Harmon. I, myself, have  
16 realised that the witness is having some difficulties  
17 as to his signature.

18 Mr. Petrusic, could you ask your question in  
19 a different way? Could you ask him whether he signed  
20 the statement, not whether he can see the signature on  
21 the statement.

22 MR. PETRUSIC: [Interpretation]

23 Q. Witness P, your signature has been redacted  
24 from the statement so we cannot see it. So my question  
25 to you is whether this is, indeed, your statement, the

1 one that you gave to the Tribunal's investigator on the  
2 14th, the 15th and the 16th of August, 1995?

3 A. I believe it is. I cannot tell you the exact  
4 date the statement was given but I think this is my  
5 statement.

6 Q. When you arrived in the school, the school  
7 was a two-storey building, was it not?

8 A. Yes.

9 Q. Was only the first floor filled with people?

10 A. I believe that it was the first floor and the  
11 ground floor. This is what I could tell judging from  
12 the voices of the people, I believe it was full.

13 Q. How many trucks arrived in your group?

14 A. I said that there had been three trucks. Two  
15 that were at the football field plus my truck. I don't  
16 know if there were any trucks later on or before.

17 Q. Let us go back to Kravica and then I will  
18 finish with my cross-examination. Was there any reason  
19 why the Bosnian Serb soldiers would be interested for  
20 that place, in particular?

21 A. I don't know.

22 MR. PETRUSC: [Interpretation]

23 Mr. President, I have no other questions to ask of this  
24 witness.

25 Q. Witness P, thank you very much.

1 JUDGE RODRIGUES: [Interpretation]

2 Mr. Petrusic, thank you very much.

3 Mr. Harmon, do you have any additional  
4 questions?

5 MR. HARMON: I do not, Mr. President. Thank  
6 you.

7 JUDGE RODRIGUES: [Interpretation] Thank you,  
8 Mr. Harmon.

9 Judge Riad.

10 JUDGE RIAD: Thank you, Mr. President. I  
11 have a few questions.

12 Good morning, Witness P.

13 A. Good morning.

14 JUDGE RIAD: Let me just try to clarify some  
15 points you mentioned from the beginning. You spoke of  
16 the column of almost ten kilometres when you were  
17 fleeing away and before you surrendered. And you said  
18 that one-third had weapons; is that right? One-third  
19 of you in the column had weapons.

20 Did you use these weapons, these weapons?  
21 Had they been used against the Serbs while you were  
22 fleeing? Was there exchange of fire, some kind of  
23 fighting or were you just running away?

24 A. There were no combats until the ambush. The  
25 people who had weapons were at the front of the column

1 and I was somewhere in the middle of the column. And I  
2 know that there had been no fighting before the ambush,  
3 but then after I had been captured, I don't know what  
4 happened.

5 JUDGE RIAD: And when you were captured, you  
6 were captured because they announced, as you said, they  
7 asked you to surrender and that you will be exchanged;  
8 is that right, that you will be safe?

9 But in spite of that, in spite of their  
10 reassurance, some committed suicide. What promoted  
11 this reaction if they knew that they would be  
12 exchanged? Did the Serbs give them this assurance?

13 A. Well, I think that they simply didn't  
14 believe. They didn't dare to believe in their  
15 guarantees, that is, that they would be exchanged,  
16 because they were killing people. They didn't pay any  
17 attention to the age, regardless of whether it was an  
18 old man or a child.

19 JUDGE RIAD: So there was killing before that  
20 and you could not trust them. That was the feeling you  
21 had, that already there was no reason - there was  
22 their precedents of killing?

23 A. Yes.

24 JUDGE RIAD: And when was that, with your  
25 group?

1           A.    Yes.

2           JUDGE RIAD:   But your group had started.

3   There was no killing before that.   What gave them this  
4   conviction that they would not - that they be killed,  
5   beforehand?

6           A.    I said that there had been an ambush, and a  
7   lot of dead bodies were scattered around the forest and  
8   people simply couldn't believe that.   They were afraid  
9   of ending up in their hands.   Thousands of people must  
10   have remained in the forest, so they couldn't trust  
11   them anymore when it comes to the surrender.

12           JUDGE RIAD:   It was the ambush.   Before that,  
13   was there any media announcing or threatening, in the  
14   media anything which gave them this conviction?

15           A.    Yes.   Throughout the war people were getting  
16   killed, and there was an order, a command, that we  
17   should go through the woods.   Somebody had issued an  
18   order to that effect.   People didn't dare.   I don't  
19   know.   They just didn't trust them.   They went to the  
20   woods.   A lot of people got killed in the woods and a  
21   lot of people killed themselves in the woods, because  
22   they were afraid of ending up in their hands.

23           JUDGE RIAD:   You were living in Srebrenica  
24   before the 11th of July?

25           A.    Yes.

1                   JUDGE RIAD: And could you listen, could you  
2 hear Serb radio and Serb television?

3                   A. No. No. We didn't have electricity at all.

4                   JUDGE RIAD: Now, at a certain stage, and I  
5 follow the question the Defence counsel asked you,  
6 certain people were called because they belonged to  
7 certain places. You had people coming from Osmac, they  
8 were asked to come out and so on. And as you said,  
9 after that you heard screams and gunfire. At a later  
10 stage, the order came by numbers. They would say,  
11 "Bring four people now," "Bring ten people now." Also  
12 at this second stage were these ten people or four  
13 people, were they more or less coming from a certain  
14 place or they would be without discrimination?

15                  A. You haven't understood me, Your Honour. I  
16 said that they were taken out individually, one by  
17 one. During the night, while I was in that truck, five  
18 people were taken off my truck. I don't know where the  
19 Serbs had come from. The trucks had canvases and they  
20 stood guard around the trucks all the time. They were  
21 working in shifts. So there would always be between 10  
22 or 15 Serb soldiers near the trucks, and they were  
23 taking people out. And during that night, five people  
24 were taken off my truck.

25                  JUDGE RIAD: All right. Then, I repeat my

1 question more precisely. When you were in classroom 1  
2 and classroom 2, you would hear an order, somebody  
3 saying, "Send me ten." Would he say: Send me ten from  
4 this village or that village? Or he would say: Send  
5 me ten just from the whole group, without  
6 discrimination?

7 A. No. I was in classroom number 3. And after  
8 my hands had been tied up, I was transferred to  
9 classroom number 2, that is, the next-door classroom.  
10 And they were not saying anything to that effect,  
11 anything involving a village. I could only hear a  
12 voice coming from outside the school, or from the  
13 entrance I would hear words, "Send me ten of them" or  
14 "Send me 20 of them." This is while I was already on  
15 the truck.

16 JUDGE RIAD: Ten of them, without saying ten  
17 of which village, or anyplace; just ten?

18 A. Yes. Yes.

19 JUDGE RTAD: Now, when you were asked how  
20 many people had been lying in the killing field, you  
21 said there would be between 1.500 and 2.000. Was there  
22 enough light for you at your escape to see the extent  
23 of the lying bodies, or was it too dark? I mean, on  
24 what did you base your estimation?

25 A. I could make an estimate on the basis of the

1 number of people who had been in the school. There  
2 were three classrooms on that floor, so there must have  
3 been up to 600 people there. So I believe the same  
4 number of people would have been on the ground floor.  
5 And I believe that there were other classrooms as  
6 well.

7 As to the area itself, I was able to observe  
8 it on the next morning, when we came out of the ditch,  
9 and also when we reached the village, because we were  
10 about 150 or 200 meters away from the spot. So I could  
11 see the whole area, and the whole area, the whole  
12 location was filled with dead bodies.

13 JUDGE RIAD: Thank you very much.

14 A. Thank you too, Your Honour.

15 JUDGE RODRIGUES: [Interpretation] Thank you,  
16 Judge Riad.

17 Judge Wald.

18 JUDGE WALD: Witness P, you told us in the  
19 beginning of your testimony that the reason that the  
20 men decided to go or were given orders to go in the  
21 woods toward Tuzla rather than to Potocari was because  
22 they didn't trust the Serbs not to kill them. They  
23 thought they wouldn't get any protection from the UN.  
24 When your group surrendered to the Serbs, what changed  
25 their mind? Why did they feel they would be able to

1 survive if they surrendered to the Serbs, when earlier  
2 they thought they wouldn't survive if they went to  
3 Potocari?

4 A. It was very simple. The groups had been cut  
5 off from the rest of the column, and they had a large  
6 number of wounded. And the order was that the wounded  
7 should be brought down and that we should all come down  
8 to the road. All the while there was a white personnel  
9 carrier travelling along the asphalt road, coming from  
10 the direction of Konjevic Polje -- this is what I  
11 forgot to mention -- moving towards Kravica. And it  
12 passed our group and they threw out two bottles of  
13 water. And I think that half of the people surrendered  
14 and came out onto the asphalt road because they  
15 believed it was a UN personnel carrier. And I think  
16 that it actually carried Serb soldiers, because they  
17 didn't say anything to us; they simply threw out two  
18 bottles of water when they passed by us. And again  
19 they went back in the direction of Konjevic Polje.

20 JUDGE WALD: You said you had a large group  
21 of wounded that you carried down at the time of  
22 surrender. Had most of those wounded been wounded in  
23 crossfire of an ambush, or had they been wounded just  
24 by the shelling from the Serbs? I mean, had they been  
25 wounded in an actual crossfire between the armed people

1 in the column and the Serbs, or just as they were  
2 trying to walk along and just got shelled?

3 A. Part of the group was exposed to a shelling  
4 and part of the group -- people from the group were  
5 wounded in the ambush that took place on that night.

6 JUDGE WALD: During the ambush there was  
7 crossfire, right, between the Muslims who were armed in  
8 the column and the Serbian soldiers. Okay.

9 Now, you mentioned about this incident with  
10 the poisonous gas that made the throat get thirsty and  
11 the eyes sting. Are you familiar with what's known as  
12 tear gas? I mean, sometimes police use it to break up  
13 crowds in demonstrations. It brings tears to your  
14 eyes, but it doesn't have -- so far as we know, it  
15 doesn't immediately blind anybody or anything like  
16 that. Was this something like tear gas, or was it  
17 anything you were familiar with before?

18 A. I couldn't tell you, Your Honour. I don't  
19 know. I just heard someone saying at one point that  
20 poisonous gases had been thrown at us. I wasn't very  
21 familiar with it. And I tried protect myself, to  
22 protect my face, and I was looking for a shelter.

23 JUDGE WALD: Did this happen only once? Was  
24 this just one incident of poisonous gas or did it  
25 happen other times, or did you hear other people say

1 that it happened to them, even if you weren't there?

2 A. I heard it from a number of people who were  
3 there, who were ambushed. I don't know what happened  
4 elsewhere or later on. I'm referring to the ambush  
5 that took place on the night between the 12th and the  
6 13th of July. The ambush was at the location called  
7 Kamenicko, called Brdo.

8 JUDGE WALD: Okay. My last question is: You  
9 said that from the burnt-out Bosniak village you were  
10 able to see this artificial lake near the killing  
11 fields, the one where the aluminum company dumped its  
12 refuse. Could you estimate the time it would take to  
13 drive from the killing fields to that lake? What would  
14 you guess or think it would take? How long to make the  
15 drive from the killing fields to that lake?

16 JUDGE RODRIGUES: [Interpretation] Witness P,  
17 just a second. I'm sorry to interrupt.

18 Mr. Visnjic, you were about to say something,  
19 probably in relation to "Tihomir Blaskic." I myself  
20 didn't get that as a translation or interpretation.  
21 Were you going to point to that?

22 MR. VISNJIC: [Interpretation] Yes,  
23 Mr. President, you're right.

24 JUDGE RODRIGUES: [Interpretation] Well, I  
25 didn't hear it in the French interpretation, but on the

1 transcript I can see that there is a kind of poisonous  
2 gas that is called Tihomir Blaskic, apparently.

3 Judge Wald, maybe you will have to repeat  
4 your question so that we can hear the answer.'

5 Thank you, Mr. Visnjic.

6 JUDGE WALD: I'm sorry. I don't know what --  
7 on my transcript, I don't see what question --

8 JUDGE RODRIGUES: [Interpretation] I'm afraid  
9 it has already disappeared from the screen. I don't  
10 know whether it has something to do with the method  
11 used by the court reporters. Maybe we should pay  
12 attention to this aspect, we should be mindful of this  
13 particular feature of the transcript. It had something  
14 to do with a question that you asked of the witness  
15 regarding tear gas which the police sometimes uses and  
16 the poisonous gas that the witness was trying to  
17 describe.

18 Mr. Harmon, you might help us, perhaps.

19 MR. HARMON: I saw the name "Tihomir Blaskic"  
20 and thought it was the wrong case, but it was at a  
21 point in the transcript at 20.02.12 and it was in  
22 response -- this witness gave an answer, and what I  
23 wrote down was: "I just heard at one point that  
24 poisonous gases Tihomir Blaskic ..." and it went on.  
25 So that's the point that Mr. Visnjic stood up.

1                   JUDGE WALD: Shall we ask the witness -- let  
2 me ask the question to the witness again, and the  
3 question was that whether the witness had any idea  
4 whether this poisonous gas was like the tear gas.

5                 A. I think it was something like that, because  
6 the rumour spread among the people that something had  
7 been thrown.

8                   JUDGE WALD: All right. We'll take that as  
9 your answer to the question. Now, I think we're still  
10 in the middle of the last -- well, okay.

11                  JUDGE RODRIGUES: [Interpretation]  
12 Mr. Visnjic.

13                  MR. VISNJC: [Interpretation] Mr. President,  
14 I think it would be sufficient to hear the transcript.  
15 The witness didn't mention Tihomir Blaskic. He used a  
16 word in Serbo-Croatian that sounded like this.

17                  JUDGE WALD: Okay. That's helpful to know  
18 that. But we have his answer later on to the straight  
19 question anyway.

20                  So just to answer my last question which I  
21 had asked you about, how long you would have estimated  
22 it took to drive from the killing field to the Dam, the  
23 artificial lake?

24                 A. We could only see from the village where our  
25 men were. We could see that lake and the field where

1 we were executed. We couldn't get close. It is behind  
2 the hill, around a bend. You have an access road to  
3 the Dam so we couldn't really see the access to that  
4 lake. In my estimate, it would take 15 or 20 minutes  
5 to get there and back.

6 JUDGE WALD: Okay.

7 JUDGE RODRIGUES: [Interpretation] Thank you,  
8 Judge Wald. I think the question of transcript will be  
9 resolved as usual. The court reporters have heard the  
10 answer and will make the necessary corrections so there  
11 is no point in wasting too much time. But it has been  
12 registered in the transcript that there was a problem.

13 Witness P, I also have some questions for  
14 you. The 13th of July, the call for surrender by Serb  
15 soldiers. In that call, they mentioned Geneva  
16 Conventions [Realtime transcript read in error "general  
17 Eva"] could you remind us in what context they  
18 mentioned the Geneva Conventions?

19 A. I think that they were guaranteeing the  
20 safety of our lives and an exchange. That was at least  
21 my opinion because I had a wounded relative, and when  
22 they mentioned the Geneva Conventions that nobody could  
23 be hurt, that we would all be exchanged. So my opinion  
24 was that they would guarantee our safety, our transfer  
25 to free territory either by exchange with their

1 vehicles or with the help of UNPROFOR.

2 JUDGE RODRIGUES: [Interpretation] So we have  
3 another type of convention. The Geneva Conventions, T  
4 think all these things have to be reviewed. We are  
5 talking about the Geneva Conventions and not the  
6 "general Eva conventions".

7 Another question, did they expressly use the  
8 words Geneva Conventions?

9 A. Yes, I personally heard them over the loud  
10 speakers saying that we would all be exchanged in  
11 accordance with the Geneva Conventions.

12 JUDGE RODRIGUES: [Interpretation] My second  
13 question. Nova Kasaba, the football pitch, the whole  
14 pitch was covered. My question, were the people  
15 sitting or standing or both?

16 A. When I arrived, everybody was sitting down.  
17 My group and those who came after me, we all sat down  
18 on the grass field of the pitch.

19 JUDGE RODRIGUES: [Interpretation] General  
20 Mladic arrived. Did he come alone or in the company of  
21 others?

22 A. I just saw the APC coming and I saw certain  
23 soldiers who were standing right next to the APC. At  
24 that moment, I didn't see whether anyone else came out  
25 with him, I don't remember. Of course there were the

1 soldiers next to him, but I do know that he, himself,  
2 and alone spoke to the people there.

3 JUDGE RODRIGUES: [interpretation] When you  
4 left the football pitch, you were boarded on trucks.  
5 Those trucks, were they already there when you arrived  
6 or did they come after you?

7 A. I didn't see them having come there before us  
8 because trucks were passing by all the time. They were  
9 driving women and children from Potocari so trucks and  
10 buses were passing by. Some were going towards  
11 Konjevic Polje, and the others were passing towards  
12 Kasaba. So I don't know whether those trucks had come  
13 there from Kasaba and were waiting for us or did they  
14 come from some other place specially. I just know that  
15 they were empty when we came off the field and started  
16 boarding them.

17 JUDGE RODRIGUES: [interpretation] While you  
18 were at the football pitch, did you see buses passing  
19 in the direction of Bratunac-Konjevic Polje with the  
20 women and other people?

21 A. Yes, yes, we did see trucks and buses passing  
22 from Konjevic Polje towards Kasaba. And in the  
23 opposite direction, there were empty buses going  
24 towards Konjevic Polje probably to Potocari again to  
25 fetch some more women and children.

1                   JUDGE RODRIGUES: [Interpretation] Witness P,  
2 I have no further questions. You have answered a large  
3 number of questions put to you.

4                   Is there something that you would like to say  
5 and that you didn't have an opportunity to say?

6                 A. First of all, I should like to thank the  
7 International Community and this Tribunal that the  
8 truth, at least about Srebrenica, should be proven and  
9 that some kind of justice is served although that is  
10 difficult to do and that everybody should be punished  
11 for this preconceived genocide in Srebrenica.

12                Let us take into account merely the fact that  
13 each family in Srebrenica has lost two or more family  
14 members. I lost 20 family members. My brother, their  
15 wives, aunts, cousins and so on.

16                So I wish once again to thank the  
17 International Community and, if it can, to resolve this  
18 problem of genocide and for all the perpetrators to be  
19 punished.

20                JUDGE RODRIGUES: [Interpretation] Thank you  
21 very much, Witness P, for coming.

22                You have many years before you to live. I  
23 think you have a very good reason to live, and that is  
24 through your actions and words, you should contribute  
25 to a world avoiding a catastrophe of this kind, and I

1 say that regardless of who is responsible.

2 Whoever committed these acts regardless of

3 the ethnic group they may belong to is horrific for all

4 human beings and the human race.

5 Witness, don't move for the moment. I think

6 that we have some exhibits to deal with. We have

7 Defence exhibit D-18.

8 Mr. Harmon, I think you don't have any

9 exhibits to tender now.

10 MR. HARMON: I don't have any exhibits.

11 JUDGE RODRIGUES: [Interpretation]

12 Mr. Petrusic, then.

13 MR. PETRUSIC: [Interpretation]

14 Mr. President, the Defence would like to tender into

15 evidence Exhibit D-18, but it seems to me that the --

16 some redactions need to be made in the Serbian version

17 which the witness has, but the English version has

18 already been redacted to remove all names that might

19 reveal the identity of the witness or other protected

20 persons.

21 JUDGE RODRIGUES: [Interpretation] Thank you,

22 Mr. Petrusic.

23 Mr. Harmon.

24 MR. HARMON: I only have a couple comments

25 about this exhibit, but I need to go into private

1 session to do so. It will only take a couple of  
2 minutes.

3 JUDGE RODRIGUES: [Interpretation]

4 Mr. Dubuisson, shall we go into private session now,  
5 please.

6 Please be seated, Mr. Petrusic.

7 [Private Session]

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9 (redacted)

10 (redacted)

11 (redacted)

12 (redacted)

13 (redacted)

14 (redacted)

15 (redacted)

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4 [Open session]

5 JUDGE RODRIGUES: [Interpretation] I see we  
6 are in open session now.

7 I think, Mr. Harmon, that it would be better  
8 to have the break, which we had planned before, to have  
9 it now, give the opportunity to Witness P to leave, and  
10 when the Chamber comes back, the other witness will be  
11 in the courtroom.

12 Will he have the same protective measures as  
13 this one, Mr. Harmon?

14 MR. HARMON: He will.

15 JUDGE RODRIGUES: [Interpretation] Very well.  
16 Witness P, good-bye. We wish you a safe journey home.  
17 We're going to have a half hour break now and we will  
18 resume work by hearing the next witness.

19 A. Thank you too, Your Honours.

20 [The witness withdrew]

21 --- Recess taken at 12.20 p.m.

22 --- On resuming at 12.56 p.m.

23 [The witness entered court]

24 JUDGE RODRIGUES: [Interpretation] Good  
25 afternoon, Witness. Can you hear me? Can you hear